> those three layers being disposed on at least one face of the substrate film (a). The resin layer (d) has fine irregularities on the surface. The surface of the resin layer of the multilayer film has a reflectance of less than 2%.

However, the Applicants respectfully submit that Oka actually discloses something quite different. Instead, Oka discloses a hard coat layer containing electrically conductive particles. Oka does not disclose an electrically conductive layer and a hard coat layer. Oka discloses the use of antimony-SnO_2 or ITO as being preferred because electronic conduction is improved and there is an electromagnetic wave shielding effect. This is sharply contrasted to the Applicants' claims, which recite a hard coat layer (b) and an electrically conductive layer (c). As a consequence, the Applicants respectfully submit that there is a fundamental difference between the disclosure of Oka and the rejected claims.

The rejection also states that:

> The surface of the resin layer (d) of the multilayer film has a reflectance of less than 2% (col. 1, lines 44-45).

That portion of the rejection refers to col. 1, lines 44-45, of Oka. The Applicants reproduce the entire sentence from Oka that spans lines 41 and 47 of col. 1 for the Examiner's convenience below:

> It is already known that, when incident light perpendicularly enters a thin film, in order for the antireflection film to prevent the reflection of light by 100% and to pass light by 100% therethrough, relationships represented by the equations (1) and (2) should be met (see "Science Library" Physics=9 "Optics," pp. 70-72, 1980, Science Sha Ltd., Japan).

This text does not refer to the aforementioned reflectance of less than 2% in the context of the Oka disclosure. All this sentence means is that certain equations need to be satisfied to prevent light perpendicularly entering the film, a need to satisfy certain equations to prevent reflection of the light by 100% and to pass the light by 100% through the thin film. There is no

statement of any actual reflectance of less than 2%. In fact, there is no mention of a reflectance of less than 2% that is associated with any Oka film in that portion of the text. This is because that portion of the text is located in the "Background" section of Oka and essentially has nothing to do with the Oka invention itself. This is also a serious flaw in Oka.

Referring back to the admitted deficiency of Oka with respect to the surface roughness Ra, the rejection turns to Murata to cure that deficiency. However, there is also a serious problem with Murata. The rejection specifically states:

> Murata discloses antiglare material having arithmetic average surface roughness Ra rmaging [sic] from 0.003 μm to 0.025 μm or a haze of less than 3%.

The Applicants respectfully submit that this portion of the rejection is an apparent typographical error or misreading of the actual Murata disclosure. This is seen by reference to col. 3 of lines 61-64, which are specifically referred to in the rejection. The Applicants again reproduce the entire sentence spanning lines 61-64 for the Examiner's convenience as follows:

> The glittering phenomenon of the displayed images would be strong when Ra exceeds 0.30 μm while no sufficient antiglare effect can be exhibited when Ra is smaller than 0.03 μm.

This is merely a repeat of the formula that is disclosed in line 49 of col. 3, which is labeled as formula (3).

Importantly, it is easily seen at the range of surface roughness Ra is 0.03-0.3 μm. This is, however, sharply contrasted to the Applicants' claimed surface roughness of 0.003 μm to 0.025 μm. In other words, there is no overlap between the two surface roughnesses and, in fact, there is a substantial gap between the claimed range and the disclosed range of Murata. What this means is that even if one skilled in the art were to take the surface roughness values of Murata and combine them with the Oka disclosure, which does not refer to surface roughnesses at all,

the result would be an Oka film having a surface roughness of 0.03-0.3 μm. Unfortunately, this would result in a thin film that is completely different from the Applicants' claimed multilayer film having a surface roughness Ra ranging from 0.003 μm to 0.025 μm. On this basis alone, the rejection must fail.

There is a reason for the differences between those ranges. The Applicants use the surface roughness Ra to control transparency and scratch resistance while surface roughness Ra of Murata is controlled to achieve an antiglare effect. Because the purposes are different, Murata and the Applicants proceed in different directions to achieve their different objectives. In any event, the hypothetical combination fails to result in what the Applicants claim.

With respect to Claims 5-7, the rejection states that "Oka discloses that the electrically conductive layer (c) has a thickness of 0.01 μm to 1.0 μm (*col. 9, lines 63-67*)." However, the Applicants respectfully submit that this is also an error. In fact, Oka discloses the thickness of an antiglare-hard coat layer at col. 9, lines 63-67, and does not disclose the thickness of the electrically conductive layer (c). Thus, the Applicants respectfully submit that the combination of Murata with Oka is also inapplicable to Claims 5-7 as well.

The Applicants respectfully submit that the combination is also inapplicable to Claims 8-10 and 12 for additional reasons. In that regard, the Applicants' claimed resin layer (d) is a layer having a low refractive index. On the other hand, Oka discloses a layer having a low refractive index that employs inorganic materials. However, it does not disclose a layer having a low refractive index made of a flourine-containing copolymer. Also, the rejection recites "silica particles with a particle size of 0.001 μm to 0.2 μm and two or more particle size distribution (*col. 9, lines 33-34*)." However, the Applicants note that this is actually an explanation of the

particles in the antiglare hard coat layer, not an explanation directed to the particles of a resin layer (d).

Finally, the rejection states that "Oka discloses a silane coupling agent that meets the formulas of Claim 11" with reference to col. 16, lines 1-20. However, Oka discloses the silane coupling agent to form the SiO_x film in a plasma CVD. Thus, the Applicants respectfully submit that Oka, taken alone or taken in conjunction with Murata, is inapplicable to Claim 11. Withdrawal of the rejection of all of Claims 1-17 is respectfully requested.

In light of the foregoing, the Applicants respectfully submit that the entire Application is now in condition for allowance, which is respectfully requested.

Respectfully submitted,

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